

Remarks

Reconsideration of this application as amended is respectfully requested.

Claims 1, 4, 6, 9, 13, and 16 stand rejected under 35 U.S.C. §102(e) in view of U.S. Patent No. 6,698,021 of *Amini et al.* ("*Amini*").

Claims 2-3, 5, 14-15, and 17-18 stand rejected under 35 U.S.C. §103(a) in view of *Amini*.

Claims 7-8, 10-12, and 19-20 stand rejected under 35 U.S.C. §103(a) in view of *Amini* and U.S. Patent No. 6,591,367 of *Kobata et al.* ("*Kobata*").

The examiner has stated that the declaration is defective. In response, applicant submits herewith a new declaration.

Applicant respectfully submits that amended claim 1 is not anticipated by *Amini* because *Amini* does not disclose a device that obtains configuration data for its behaviors by generating a request to a configuration server and receiving the configuration data in a response to the request as claimed in amended claim 1. Instead, *Amini* discloses a remote camera that obtains camera control commands from a client work station in response to user input. (*Amini*, col. 3, lines 44-53 and col. 7, lines 50-56 and col. 8, lines 32-39). For example, *Amini* discloses a ViewControl application 620 executing on a workstation 322 that generates a camera control user interface on the workstation 322 that enables a user to control the pan-tilt-zoom (PTZ) functions of a remote camera 312. (*Amini*, col. 8, lines 32-39). *Amini* also discloses that the ViewControl application 620 transfers the camera control commands to a CameraControl application 520 executing in a server 322. (*Amini*, col. 7, lines 50-56 and col. 8, lines 32-39). *Amini* further discloses that the CameraControl application 520 forwards the camera control commands to the remote camera 312 via

a server 314. (*Aminin*, col. 8, lines 32-39 and col. 18, lines 17-19). *Amini* does not teach that the remote camera 312 generates a request to obtain the camera control commands.

The examiner has stated that

Amini teaches...device that transfers a request message via a communication network [see column 9, lines 55-67 and column 10, lines 1-3 and figure 7, element 702, 704 and figure 3 element 310] (Page 2, last line - page 3, first three lines, Office Action, 9-8-04).

Applicant respectfully submits that the sections of *Amini* cited by the examiner do not teach a device that generates a request message as claimed in amended claim 1. Instead, these cited sections of *Amini* teach that the camera server 314 notifies an ImageCapture application 510 of the occurrence of an event at the site of a remote camera, e.g. the opening of a door. (*Amini*, col. 9, lines 58-64). It is submitted that a notification of an event that occurs at a remote site is not a request for configuration data as claimed in amended claim 1. It is also submitted that the configuration file disclosed by *Amini* does not pertain to the behaviors of a device as claimed in amended claim 1. Instead, the configuration file of *Amini* determines the actions of the ImageCapture application 510 in response to an event. (*Amini*, col. 9, line 65 through col. 10 line 3).

It is therefore respectfully submitted that that system of amended claim 1 that includes a device that obtains configuration data for its behaviors by generating a request to a configuration server and that receives the configuration data from the configuration server in a response to the request is not anticipated by the system of *Amini* that sends camera control commands to a remote camera in response to a user input.

Given that claims 2-12 depend from amended claim 1, it is submitted that claims 2-12 are not anticipated by *Amini*.

It is also submitted that amended claim 13 is not anticipated by *Amini*. Amended claim 13 is a method for configuring a device that includes limitations similar to the limitations of amended claim 1 including generating a request message for configuration data in a device. Therefore, the remarks stated above with respect to amended claim 1 and *Amini* also apply to amended claim 13.

Given that claims 14-20 depend from amended claim 13, it is submitted that claims 14-20 are not anticipated by *Amini*.

Applicant submits that claims 2-3, 5, 14-15, and 17-18 are not obvious in view of *Amini*. Claims 2-3, 5, 14-15, and 17-18 depend from amended claims 1 and 13 and applicant has shown that *Amini* does not disclose or suggest a device that obtains configuration data for its behaviors by generating a request and receiving the configuration data in a response to the request as claimed in amended claims 1 and 13.

Applicant further submits that claims 7-8, 10-12, and 19-20 are not obvious in view of *Amini* and *Kobata*. Claims 7-8, 10-12, and 19-20 depend from amended claims 1 and 13 and applicant has shown that *Amini* does not disclose or suggest a device that obtains configuration data for its behaviors by generating a request and receiving the configuration data in a response to the request as claimed in amended claims 1 and 13. Moreover, *Kobata* does not disclose or suggest a device that obtains configuration data for its behaviors by generating a request and receiving the configuration data in a response to the request as claimed in amended claims 1 and 13. Instead, *Kobata* discloses a system for protecting

messages from unauthorized access. (Kobata, col. 2, lines 18-22).

It is respectfully submitted that in view of the amendments and arguments set forth above, the applicable objections and rejections have been overcome.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 50-1078 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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